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May 14, 2013

Via Facsimile: 973-776-7865

Honorable Cathy L. Waldor, U.S.M.J.
M.L. King, Jr. Fed. Bldg. and Courthouse
50 Walnut Street
Newark, New Jersey 07102

SO ORDERED

s/Cathy L. Waldor
Cathy L. Waldor, U.S.M.J.

Date: 5/14/13

Re: Lorraine Z. Waitkus v. Galaxy Asset Purchasing, LLC et als.
Civil Case Number: 2:12-CV-06971-SRC-CLW

Dear Judge Waldor:

I have conferred with my adversary and we have agreed to the following proposed discovery schedule.

1. Confidentiality order: submitted by Defendants on or before May 17, 2013.
2. All documents and information withheld because of the absence of the confidentiality order or other investigation: 14 days from the execution of the confidentiality order.
3. Good faith meet and confer regarding discovery disputes: within 14 days of the due date for confidential documents and information withheld. Correspondence to court regarding discovery disputes anytime thereafter.
4. Propound follow up paper discovery: July 13, 2013; answers due in the ordinary course
5. 180 day general discovery extension, with all dates adjusted accordingly.

Respectfully submitted,

WESLEY G. HANNA

Fact and Date
is extended to
NOVEMBER 13, 2013.

WGH/j

cc: Ross S. Enders, Esquire (Via Fax 908-751-5944)

The court will hold a telephone CONF. ON September 25, 2013 at 11:00 AM. Discontinue to participate in the call.